

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALBERTO-CULVER USA, INC.,)	
)	
Plaintiff,)	Case No. 09-CV-05899
)	
v.)	
)	Judge Suzanne B. Conlon
THE PROCTER & GAMBLE COMPANY)	
and NOXELL CORPORATION,)	
)	
Defendants.)	
)	

**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT**

The parties to this action, by their attorneys, respectfully move for a fourteen (14) day extension of time for Defendants The Procter & Gamble Company and Noxell Corporation to answer or otherwise respond to Plaintiff Alberto-Culver USA, Inc.'s Amended Complaint. In support of this motion, the parties state as follows:

1. Following settlement discussions, the parties have agreed in principle to a settlement of all claims in this case.
2. Pursuant to the briefing schedule in this case, however, Defendants' response to the Amended Complaint is due next week, on March 23, 2010.
3. The parties are currently preparing settlement papers and anticipate that the Amended Complaint will be voluntarily dismissed and the case closed within fourteen (14) days of that date.
4. An enlargement of Defendants' time to respond to Plaintiff's Amended Complaint by fourteen (14) days would enable the parties to conclude settlement negotiations and would serve the interests of the parties and judicial economy by not requiring Defendants to devote

resources toward filing an unnecessary Answer or Motion.

WHEREFORE, Plaintiff Alberto-Culver USA, Inc. and Defendants The Procter & Gamble Company and Noxell Corporation jointly request that this Court extend the time for Defendants to answer or otherwise respond to Plaintiff's Amended Complaint by fourteen (14) days, until April 6, 2010.

Dated: March 18, 2010

Respectfully Submitted,

THE PROCTER & GAMBLE COMPANY
AND NOXELL CORPORATION

By:

/s/ Michael P. Conway
One of Their Attorneys

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ALBERTO-CULVER USA, INC.

By:

/s/ Terrence J. Dee
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT** to be served on Plaintiff via CM/ECF electronic delivery this 18th day of March, 2010 to:

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